

DOCKET SECTION

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Post E.C.S.

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Docket No. C99-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-1-7)
June 28, 1999

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents to the United States Postal Service.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses to these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets,

charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such printouts, microfilms, cards, discs, tapes or other recordings.

"All documents" means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is

possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

OFFICE OF THE CONSUMER ADVOCATE

A handwritten signature in black ink, appearing to read "Ted P. Gerarden", is written over a horizontal line.

Ted P. Gerarden
Director

Shelley S. Dreifuss
Attorney

OCA/USPS-1. Please refer to the Postal Service response to question 1 of Order No. 1229. In part a. of the response, the Postal Service states that the operations test of Post E.C.S. has not concluded and that "Post E.C.S. is scheduled to continue at least through mid-June 1999." In part c., the Postal Service states that "There are no current plans to request approval from the Board of Governors for an extension, nor any understanding that such a request would be necessary or appropriate at this juncture."

- a. How many months beyond mid-June 1999 will the Post E.C.S. operations test continue?
- b. Is the Post E.C.S. operations test definitely scheduled to end on a particular date? If so, what is the date?
- c. Is the Post E.C.S. operations test tentatively scheduled to end on a particular date? If so, what is the date?
- d. Is the Post E.C.S. operations test definitely scheduled to end during a particular season? If so, what is the season?
- e. Is the Post E.C.S. operations test tentatively scheduled to end during a particular season? If so, what is the season?
- f. Is the Post E.C.S. operations test definitely scheduled to end in a particular year? If so, what is the year?
- g. Is the Post E.C.S. operations test tentatively scheduled to end in a particular year? If so, what is the year?

OCA/USPS-2. Did the Board of Governors approve or otherwise authorize the Post E.C.S. operations test? If so, provide all documents relating to such approval or authorization. If the Board of Governors did not approve or otherwise authorize the Post E.C.S. operations test, please identify the person that approved or otherwise authorized the Post E.C.S. operations test, and provide all documents relating to such approval or authorization.

OCA/USPS-3. Part b of the Postal Service response to question 1 of Order No. 1229 provides that "Post E.C.S. is in operations test status"

- a. What is signified by "operations test status?"
- b. What will be the new status after the operations test status stage is complete?

OCA/USPS-4. Exhibit A to the United Parcel Service Complaint (filed October 6, 1998) consists of a printout of material found at www.postofficeonline.com.

- a. The sixth paragraph of the printout contains the statement. "Post E.C.S. is currently available in market test." Is that statement correct? If so, please reconcile it with the statement contained in question 1, part b, response to Order No. 1229, that the Post E.C.S. is in operations test status.
- b. Explain the distinction between an "operations test" and a "market test," if any.
- c. The first line of the printout states "POST E.C.S. 30-DAY FREE TRIAL." Are Post E.C.S. registrants limited to a 30-day free trial? What happens after the 30-day period has expired?

- d. Have any Post E.C.S. registrants been participants for more than 30 days? If so, how long?
- e. Has the Postal Service charged and/or collected fees from any users of Post E.C.S.? If so, provide a schedule of applicable fees for Post E.C.S. service.
- f. Has the Postal Service developed fees or potential fees for Post E.C.S. service? Provide a copy of all such fees or potential fees.

OCA/USPS-5. Is the Postal Service still accepting new registrants for Post E.C.S.? Please explain.

OCA/USPS-6. An article about Post E.C.S. appeared in *The Oakland Tribune* on Sunday, July 19, 1998 (Exh. B of the Complaint). Paragraph 10 states:

How much? Rate will be based on the amount of memory used. The Postal Service plans to charge \$2.50 per transaction of up to two megabytes (that means about two novels' worth of text) and \$5 for five-megabyte documents. Each additional copy costs \$1.

- a. Does the Postal Service still expect to charge for this service based on the amount of memory used or some other basis? Please specify.
- b. If memory used is still the basis, are the amounts shown above within a close range of the Postal Service's current thoughts on possible charges?

OCA/USPS-7. Please refer to the attachment to "Response of United States Postal Service to Order No. 1229 Requesting Supplemental Information," question no. 4.

- a. Please explain what "an authorized USPS Post E.C.S. service provider" is
- b. How is this status differentiated from "hav[ing] a valid account with USPS"?

CERTIFICATE OF SERVICE

I hereby certify that on behalf of the Office of the Consumer Advocate, I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


STEPHANIE S. WALLACE

Washington, D.C. 20268-0001
June 28, 1999